

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

)  
TROY BEARDEN, individually and on behalf ) Civil Action No.: 2:11-cv-01511-NBF  
of all persons similarly situated, )  
Plaintiff, ) **MOTION FOR ADMISSION**  
v. )  
PRECISION AIR DRILLING ) **PRO HAC VICE**  
SERVICES, INC., )  
Defendant. )

**MOTION FOR ADMISSION PRO HAC VICE**

NOW COMES Patrick W. Ritchey, a member in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and attorney and partner with the firm Reed Smith, LLP, who hereby moves this Honorable Court to admit Donald B. Massey, *pro hac vice*, for purposes of the above-captioned action, to serve as counsel for the Defendant. In support of this motion, undersigned counsel states as follows:

1. Donald B. Massey is the sole shareholder of the law firm Donald B. Massey, P.C. at the Wells Fargo Bank Center, Suite 450, 2808 North Avenue, Grand Junction, Colorado, 81501.
2. Mr. Massey received his Juris Doctor from University of Denver Sturm School of Law in 1977. He is licensed to practice in, and is a member in good standing of the Bar of the State of Colorado. Mr. Massey is also admitted to practice before the United States District Court for the District of Colorado and the United States District Court for the District of North Dakota.
3. Mr. Massey has received one disciplinary action: On March 12, 1983, he received Letter of Admonition GC 82A-14 from the Grievance Committee of the Supreme Court of Colorado.
4. Mr. Massey has read and understands the Local Rules and has stated that he will comply with the Federal Rules for Civil Procedure and the applicable Local Rules.

5. Mr. Massey certifies that he is a registered user of the Electronic Case Filing System in the United States District Court for the District of Western Pennsylvania.
6. Attached hereto as Exhibit A in support of this motion is an affidavit of Attorney Donald B. Massey.
7. Mr. Ritchey has conferred with Plaintiff's counsel, Sarah R. Schalman-Bergen, regarding this motion and that she has indicated that she does not oppose the action sought by this motion.
8. A proposed Order is attached.
9. WHEREFORE, the undersigned, a member in good standing of the bar of this Court, respectfully moves this Court to enter an Order admitting Donald B. Massey to the bar of this Court, *pro hac vice*.

Respectfully submitted,

/s/ Patrick W. Ritchey

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/s/ Donald B. Massey

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*Co-Counsel for Defendant  
Precision Air Drilling Services, Inc.*

Dated: September 17, 2012

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on the 18th day of September, 2012, the above and foregoing were filed electronically through the ECF system. Parties may access this filing through the ECF system. Notice of this filing will be sent to the following counsel of record by operation of the Court's electronic filing system.

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/s/ Patrick W. Ritchey